

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ROBERT DEDMON,

Plaintiff,

v.

SHELL EXPLORATION & PRODUCTION
COMPANY AND SHELL TRADING
SERVICES COMPANY,

Defendants

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CIVIL ACTION NO.

4:21-CV-03371

DEFENDANTS' WITNESS LIST

Defendants Shell Exploration & Production Company and Shell Trading Services Company ("Defendants" or "Shell") anticipate calling the following witnesses at trial:

1. Plaintiff Robert Dedmon
2. Michael Tickle
c/o Marlene Williams
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
500 Dallas Street, Suite 2100 Houston, Texas 77002
Phone: (713) 655-0855

Mr. Tickle was Plaintiff's supervisor during a significant period of his employment. Mr. Tickle will provide testimony about Plaintiff's performance and employment, as well as other topics relating to the allegations in Plaintiff's First Amended Complaint.

3. Jennifer Hartnett
c/o Marlene Williams
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
500 Dallas Street, Suite 2100 Houston, Texas 77002
Phone: (713) 655-0855

Ms. Hartnett was involved in Plaintiff's hiring and was a supervisor during a portion of his employment. Ms. Hartnett will provide testimony about Plaintiff's performance and employment, as well as other topics relating to the allegations in Plaintiff's First Amended Complaint.

4. Erin Verdon
c/o Marlene Williams
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
500 Dallas Street, Suite 2100 Houston, Texas 77002
Phone: (713) 655-0855

Ms. Verdon is VP of HR in Trading and Supply at Shell and will provide testimony about certain of Defendant's policies and procedures related to Plaintiff's employment and compensation, as well as other topics relating to the allegations in Plaintiff's First Amended Complaint.

5. Michael Deley
c/o Marlene Williams
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
500 Dallas Street, Suite 2100 Houston, Texas 77002
Phone: (713) 655-0855

Mr. Deley was one of Plaintiff's colleagues during a portion of his employment at Shell. Mr. Deley will provide testimony about the open JG4 position at Shell in 2021 and his application for the position, as well as other topics relating to the allegations in Plaintiff's First Amended Complaint.

6. Christopher Riley
c/o Marlene Williams
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
500 Dallas Street, Suite 2100 Houston, Texas 77002
Phone: (713) 655-0855

Mr. Riley was a manager over Plaintiff's department for a portion of Plaintiff's supervisor employment. Mr. Riley will provide testimony about Plaintiff's performance and employment, as well as other topics relating to the allegations in Plaintiff's First Amended Complaint.

7. Any witness identified by Plaintiff.
8. Any witness needed for foundation, impeachment, and/or rebuttal.

Respectfully submitted,

**OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.**

/s/ Marlene C. Williams

Marlene C. Williams

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**ATTORNEY-IN-CHARGE FOR
DEFENDANTS**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Defendants' Witness List has been served on all counsel of record via ECF on February 10, 2025.

/s/ Marlene C. Williams

Marlene C. Williams